



INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES, MOVING PICTURE TECHNICIANS,
ARTISTS AND ALLIED CRAFTS OF THE UNITED STATES, ITS TERRITORIES AND CANADA

April 18, 2018

VIA NLRB E-FILING

Roxanne Rothschild
Deputy Executive Secretary
National Labor Relations Board
1015 Half Street SE
Washington, DC 20570

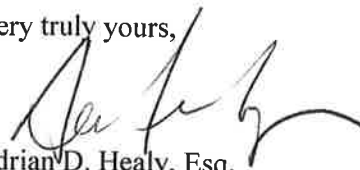
Re: Request for Information Concerning Representation Case Procedures

Dear Ms. Rothschild:

This responds to the National Labor Relations Board's request for information from the public regarding representation election regulations, 29 CFR §§101-102. I am counsel to the International Alliance of Theatrical Stage Employees, Moving Picture Technicians, Artists and Allied Crafts of the United States, Its Territories and Canada, AFL-CIO, CLC ("IATSE"), a labor organization representing more than 130,000 workers throughout North America. A substantial part of my practice includes representing labor organizations and employees before the National Labor Relations Board. I believe the case procedures set forth in the current regulations should not change. The amendments to the procedures adopted in December 2014 represent modest and common-sense changes in the processing of petitions for an NLRB election. I urge the Board not to alter the amendments. In my experience under the amended rules:

1. Unnecessary litigation has been reduced and the time required for the Board to process representation petitions has been shortened.
 2. The rules have been made simpler and easier for union representatives and employees to understand.
 3. Board practice has been brought more into line with judicial practice and thus made participation in representation cases easier for counsel.
 4. All parties have been accorded due process.
 5. Employers that wished to do so have mounted vigorous campaigns that have effectively conveyed the same types of information using the same methods as was the case prior to the amendments.
 6. Employees have been better able to exercise their right to petition and to make a free choice of whether to be represented.
- Thank you for your attention to this matter.

Very truly yours,


Adrian D. Healy, Esq.
Associate Counsel

207 West 25th Street
4th Floor
New York, NY 10001
Tel: 212-730-1770
Fax: 212-730-7809

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